EXHIBIT D



AN Bax <office.baxlaw@gmail.com>

C/A No.: 9:19-cv-2163-RMG-MGB Reports

2 messages

AN Bax <office.baxlaw@gmail.com>

Mon, Apr 27, 2020 at 4:24 PM

To: cscott@lawofficeofchristyscott.com, leadparalegal@lawofficeofchristyscott.com

Cc: Naki Richardson-Bax <naki.baxlaw@gmail.com>, Bax Law Firm <arie.baxlaw@gmail.com>



Syncrhonized Ellis Video - Full.avi

Please see attached Preliminary Report, Medical Records and Dental Records for the above captioned subject. Hard copies and synchronized video to follow via separate correspondence.

Sincerely,

Elizabeth Bufkin Paralegal The Bax Law Firm PA 2 Merchants Lane Suite 210 Beaufort, SC 29907 O: (843) 522-0980

F: (843) 379-3115

E: office.baxlaw@gmail.com Website: www.baxlawfirm.com

Facebook: www.facebook.com/BaxLawFirm/

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AN Bax <office.baxlaw@gmail.com>

Tue, Sep 22, 2020 at 3:03 PM

To: "leadparalegal lawofficeofchristyscott.com" <leadparalegal@lawofficeofchristyscott.com>

Synchronized videos Sincerely,

Elizabeth Bufkin Paralegal The Bax Law Firm PA 10 Sams Point Way Ste B-1 PMB 138 Beaufort, SC 29907 0: (843) 522-0980 F: (843) 379-3115

E: office.baxlaw@gmail.com Website: www.baxlawfirm.com 9:19-cv-02163-RMG-MGB Date Filed 10/14/20 Entry Number 42-4 Page 3 of 11

Gmail - C/A No.: 9:19-cv-2163-RMG-MGB Reports

10/14/20, 11:14 AM

Facebook: www.facebook.com/BaxLawFirm/

Due to the current state of emergency, Bax Law Firm is operating remotely only. We are still available via telephone (843) 522-0980 and email. We are scheduling meetings via Telephone and Zoom or Facetime video conference. Although we are receiving mail, kindly email any documents requiring an immediate or timely response. Our physical location will be closed until further notice.

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Gmail - C/A No.: 9:19-cv-2163-RMG-MGB Reports



AN Bax <office.baxlaw@gmail.com>

Page 4 of 11

C/A No.: 9:19-cv-2163-RMG-MGB Reports

2 messages

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Mon, Apr 27, 2020 at 3:21 PM

To: cscott@lawofficeofchristyscott.com, leadparalegal@lawofficeofchristyscott.com

Cc: Bax Law Firm <arie.baxlaw@gmail.com>, Naki Richardson-Bax <naki.baxlaw@gmail.com>

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2 attachments

Coastal Carolina Medical Records 1.pdf 19324K

Coastal Carolina Records 3.pdf 6261K

AN Bax <office.baxlaw@gmail.com>

Tue, Sep 22, 2020 at 3:01 PM

To: "leadparalegal lawofficeofchristyscott.com" <leadparalegal@lawofficeofchristyscott.com>

Ellis Medical Records Sincerely,

Elizabeth Bufkin Paralegal The Bax Law Firm PA Gmail - C/A No.: 9:19-cv-2163-RMG-MGB Reports

10/14/20, 11:14 AM

10 Sams Point Way Ste B-1 PMB 138

Beaufort, SC 29907 O: (843) 522-0980 F: (843) 379-3115

E: office.baxlaw@gmail.com Website: www.baxlawfirm.com

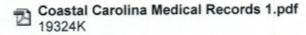
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[Quoted text hidden]

2 attachments







AN Bax <office.baxlaw@gmail.com>

Tue, Sep 22, 2020 at 3:50

RE: 19-125; Ted D. Ellis & Teresa Ellis v. C. Kirkman, indv; A. Swinehammer, indv; L. Gibson, indv; and as agents/officers Town of Bluffton PD & Town of Bluff PD;: Fwd: C/A No.: 9:19-cv-2163-RMG-MGB Reports

1 message

leadparalegal@lawofficeofchristyscott.com

<leadparalegal@lawofficeofchristyscott.com>

To: AN Bax <office.baxlaw@gmail.com>

Cc: Christy Scott <cscott@lawofficeofchristyscott.com>

Elizabeth:

Please allow this to confirm receipt of the synchronized videos.

Are discovery responses forthcoming in addition to the documents and videos previously forwarded?

Tamika D. Simmons

Lead Paralegal to Christy L. Scott

May everyday be filled with great expectation and overwhelming peace!

Law Offices of Christy L. Scott, LLC

108 Carn Street, Post Office Box 1515

Walterboro, South Carolina 29488

Office:

(843) 782-4359

Facsimile: (843) 782-4362

From: AN Bax <office.baxlaw@gmail.com> Sent: Tuesday, September 22, 2020 3:04 PM 9:19-cv-02163-RMG-MGB Date Filed 10/14/20 Entry Number 42-4 Page 7 of 11

Gmail - RE: 19-125 ; Ted D. Ellis & Teresa Ellis v. C. Kirkman, indv...PD & Town of Bluff PD ;: Fwd: C/A No.: 9:19-cv-2163-RMG-MGB Reports

10/14/20, 11:15 AM

To: leadparalegal lawofficeofchristyscott.com <leadparalegal@lawofficeofchristyscott.com>
Subject: 19-125; Ted D. Ellis & Teresa Ellis v. C. Kirkman, indv; A. Swinehammer, indv; L. Gibson, indv; and as agents/officers Town of Bluffton PD & Town of Bluff PD;: Fwd: C/A No.: 9:19-cv-2163-RMG-MGB Reports

Synchronized videos

Sincerely,

Elizabeth Bufkin

Paralegal

The Bax Law Firm PA

10 Sams Point Way Ste B-1 PMB 138

Beaufort, SC 29907

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Date: Mon, Apr 27, 2020 at 4:24 PM

Subject: C/A No.: 9:19-cv-2163-RMG-MGB Reports

To: <cscott@lawofficeofchristyscott.com>, <leadparalegal@lawofficeofchristyscott.com>

Cc: Naki Richardson-Bax <naki.baxlaw@gmail.com>, Bax Law Firm <arie.baxlaw@gmail.com>

9:19-cv-02163-RMG-MGB Date Filed 10/14/20 Entry Number 42-4 Page 8 of 11

Gmail - RE: 19-125 ; Ted D. Ellis & Teresa Ellis v. C. Kirkman, indv...PD & Town of Bluff PD ;: Fwd: C/A No.: 9:19-cv-2163-RMG-MGB Reports

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Paralegal

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Beaufort, SC 29907

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AN Bax <office.baxlaw@gmail.com>

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1 message

leadparalegal@lawofficeofchristyscott.com

<leadparalegal@lawofficeofchristyscott.com>

To: AN Bax <office.baxlaw@gmail.com>

Cc: Christy Scott <cscott@lawofficeofchristyscott.com>

Tue, Sep 22, 2020 at 3:39

Elizabeth:

Please allow this to confirm receipt of your email. It was my pleasure as well.



Tamika D. Simmons

Lead Paralegal to Christy L. Scott

May everyday be filled with great expectation and overwhelming peace!

Law Offices of Christy L. Scott, LLC

108 Carn Street, Post Office Box 1515

Walterboro, South Carolina 29488

Office:

(843) 782-4359

Facsimile: (843) 782-4362

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To: leadparalegal lawofficeofchristyscott.com <leadparalegal@lawofficeofchristyscott.com>

Subject: 19-125; Ted D. Ellis & Teresa Ellis v. C. Kirkman, indv; A. Swinehammer, indv; L. Gibson, indv; and as agents/officers Town of Bluffton PD & Town of Bluff PD ;: Fwd: C/A No.: 9:19-cv-2163-RMG-MGB Reports

Tamica

It was a pleasure talking to you today. Here is the Preliminary Expert Report that I sent to Ms. Scott on April 27th.

Sincerely,

Elizabeth Bufkin

Paralegal

The Bax Law Firm PA

10 Sams Point Way Ste B-1 PMB 138

Beaufort, SC 29907

O: (843) 522-0980

F: (843) 379-3115

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10/14/20, 11:13 AM

subject. Hard copies and synchronized video to follow via separate correspondence.

Preliminary Expert Report, 4-1-2020.pdf

Sincerely,

Elizabeth Bufkin

Paralegal

The Bax Law Firm PA

2 Merchants Lane Suite 210

Beaufort, SC 29907

O: (843) 522-0980

F: (843) 379-3115

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